

May 20, 2023

Via Electronic Delivery:
Nickel.Brian@epa.gov

Ms. Susan Poulsom and Mr. Brian Nickel
Water Division, NPDES Permitting Section
US EPA Region 10
1200 Sixth Avenue, Suite 155
Seattle, Washington 98101

Subject: Public Notice Comments: NPDES Permit No. WA0050202
Washington Beef, LLC - Toppenish Plant

Dear Ms. Poulsom and Mr. Nickel:

I am writing in my own personal capacity to express concern over the EPA's recently issued National Pollutant Discharge Elimination System (NPDES) permit for Washington Beef's processing plant in Toppenish, WA.

As an Associate Professor in Meat Science at the University of Idaho in Moscow, ID, I have worked closely with Washington Beef for 6 years. The collaboration with Washington Beef has strengthened our program for the benefit of our students and the University of Idaho community as a whole. Countless times Washington Beef has worked to better the students and stakeholders of the Pacific Northwest by welcoming students as employees, allowing many field trips to help classes understand where their food comes from, and has assisted in beef quality research for the betterment of farmers and ranchers in the Pacific Northwest and the United States.

Through this experience, I have personally witnessed Washington Beef's commitment to protecting the local environment. They utilize industry-leading best practices at the Toppenish plant and have a sterling track record that is free of any cited violations justifying the significant changes being proposed. Washington Beef is one of the most progressively minded businesses in the meat industry and is always looking for ways to better their company, employees, community and environment.

I have also seen the enormous positive impact Washington Beef has on our region and throughout the State of Washington. They are an important employer and economic development driver that would be difficult, if not impossible, to replace for the community of Toppenish and surrounding areas.

I'm concerned that all of this will be put at risk by imposing regulatory standards that are both unachievable and unnecessary. I support the EPA's mission, but sweeping changes such as those being proposed in the new NPDES permit should be reserved for cleaning up bad behavior in the industry, not

imposed on good actors who are valued neighbors and community partners, especially when those changes were developed outside of the normal federal rulemaking process.

I urge you to reconsider the draft NPDES Permit and work with Washington Beef to identify more sustainable solutions that allow the EPA to accomplish its mission while also preserving the economic and social benefits that the company provides to our community, as well as their ongoing investments to reduce impacts and improve the environment. And selfishly, I want to make sure that the Toppenish plant is in operation for years to come given the strong existing partnership and benefit that provides to my students.

Thank you for the opportunity to submit these comments relating to Washington Beef's NPDES Permit, which are intended to be part of the Administrative Record. Please consider my views on this important issue.

Sincerely,

A handwritten signature in blue ink that reads "Phil Bass". The signature is fluid and cursive, with the first name "Phil" and last name "Bass" clearly distinguishable.

Phil Bass, Ph.D.
Associate Professor, Meat Science
University of Idaho